

EXHIBIT A

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 30

1 Q. Do you remember when that was?
2 **A. To the best of my memory, Mr. Bell was**
3 **transferred from Delaware to Philadelphia on the**
4 **Delaware team. And to the best of my memory, he left**
5 **Mellon in the early two hundreds -- 2000's.**
6 Q. 2000's. You said he was transferred from
7 Delaware to Philadelphia at some point, Mr. Bell?
8 **A. Yes.**
9 Q. Do you remember when he was transferred?
10 **A. To the best of my memory, the late 1990's.**
11 Q. Do you know why he was transferred?
12 **A. No.**
13 Q. But after the transfer he remained a part of
14 the Delaware team, although he was in the Philadelphia
15 office?
16 **A. Mr. Bell?**
17 Q. Mr. Bell.
18 **A. Yes.**
19 Q. Do you know why Mr. Bell left the company?
20 **A. To the best of my memory, he was forced to**
21 **resign.**
22 Q. And who forced him to resign?
23 **A. To the best of my memory, Brendan Gilmore.**
24 Q. And how do you know that Brendan Gilmore forced

Page 31

1 Mr. Bell to resign?
2 **A. Brendan Gilmore was the Delaware team leader.**
3 Q. So are you making the assumption that because
4 Brendan was the Delaware team leader that he had had
5 something to do with Mr. Bell resigning?
6 **A. Please repeat the question.**
7 MS. WILSON: Can you repeat the question,
8 please?
9 (The reporter read back the last
10 question.)
11 THE WITNESS: It's not an assumption.
12 BY MS. WILSON:
13 Q. When you say it's not an assumption, how do you
14 know?
15 **A. Members of the team understood pressures**
16 **Brendan Gilmore placed on Robert Bell.**
17 Q. Now, did Mr. Bell ever tell you that
18 Mr. Gilmore had forced him to resign?
19 **A. I don't understand your question.**
20 Q. Well, did you have any conversations with
21 Mr. Bell in which he said, "Mr. Gilmore forced me to
22 resign"?
23 **A. To the best of my memory, Mr. Bell did not use**
24 **your exact words.**

Page 32

1 Q. Okay. What did he say?
2 **A. To the best of my recollection, Mr. Bell felt**
3 **the workload was becoming unbearable.**
4 Q. And those were the discussions that you and
5 Mr. Bell were having?
6 **A. I don't understand what you mean by**
7 **"discussions."**
8 Q. Well, you said that he didn't use those exact
9 words and I believe I had said that Mr. Gilmore had
10 forced him to resign and then you were saying that
11 Mr. Bell felt that the workload was becoming I think
12 unbearable.
13 My question was: Did Mr. Bell tell you
14 this?
15 **A. To the best of my memory, he did not say that**
16 **directly. I don't recall his exact words.**
17 Q. You don't recall it, but you do recall having
18 some conversations with Mr. Bell concerning his
19 workload?
20 **A. Not specifically at this time.**
21 Q. Do you remember having any discussions with
22 Mr. Bell about why Mr. Bell was resigning?
23 **A. Not specifically at this time.**
24 Q. When you say, "Not specifically at this time"

Page 33

1 what do you mean by that?
2 **A. At this time I don't recall exact dates of**
3 **conversations regarding his resignation.**
4 Q. Okay. You don't have to give me exact dates.
5 The substance.
6 **A. Substantively Mr. Bell had worked for Mellon a**
7 **number of years, had been a senior officer, trust**
8 **officer for Mellon in Delaware from the time of my**
9 **initiation of employment until his transfer into**
10 **Philadelphia and at the time of his resignation.**
11 Q. And those are the substance of conversations
12 that you had with Mr. Bell?
13 **A. What was?**
14 Q. What you just described.
15 **A. I described his, I described his title and**
16 **position from when I first was employed until the time**
17 **he left and to the best of my recollection Mr. Bell's**
18 **employment, Mr. Bell's employment evolved to pressures**
19 **put on him to resign.**
20 Q. Now, Ms. Blozis, did you ever have any
21 conversations with Mr. Bell in which he talked about
22 pressures to resign?
23 **A. Not firsthandly that I recall at this time.**
24 Q. And was it Mr. Gilmore who was putting these

9 (Pages 30 to 33)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 34

1 pressures on Mr. Bell?
2 **A. To the best of my knowledge at this time, yes.**
3 Q. And why do you say it was Mr. Gilmore, to the
4 best of your knowledge?
5 **A. Mr. Gilmore's reputation as a team leader**
6 **demonstrated that.**
7 Q. What do you mean by that?
8 **A. What do I mean by?**
9 Q. When you say his reputation as a team leader
10 demonstrated that.
11 **A. Mr. Gilmore was an extremely difficult**
12 **personality to work for.**
13 Q. Is that what members of his team said about
14 him?
15 **A. What members?**
16 Q. When you say that, and I'm just paraphrasing my
17 notes of what you said, that Mr. Gilmore's reputation
18 as a team leader demonstrated, and I'm paraphrasing
19 now, that he was difficult to work for, so my
20 assumption was that people on his team were talking
21 and saying he's difficult. Am I wrong? I mean,
22 that's what I was gathering from your answer.
23 **A. Yes.**
24 Q. That was right, that people on the team were

Page 35

1 saying he's difficult to work for?
2 **A. Yes.**
3 Q. Okay. And who were the people who were saying
4 that he was difficult to work for?
5 **A. To the best of my recollection, William Becker,**
6 **Greg Landis at any time they were team members,**
7 **Marion, Linda Squier, Martha Feters, Scott Gilliland,**
8 **Ray Masucci, Bruce Holmquist.**
9 Q. You mentioned a couple of names that I didn't
10 have before. Ray Masucci?
11 **A. As I recall, Ray Masucci was an investment**
12 **officer on our team at some point in time in**
13 **Philadelphia.**
14 Q. Now, did Mr. Bell ever tell you that he felt
15 that he was being forced to resign because of his age?
16 **A. Not directly.**
17 Q. When you say, "Not directly," what do you mean?
18 In terms of having a conversation and having said,
19 "Linda, I feel like I'm being pressured because of my
20 age"?
21 **A. Mr. Bell was a man of great integrity. He**
22 **would never have made that comment directly to an**
23 **employee at my level.**
24 Q. Did you feel that Mr. Bell was being forced to

Page 36

1 resign because of his age?
2 **A. To the best of my recollection, yes.**
3 Q. Why did you believe that?
4 **A. I believe Brendan Gilmore wanted to eliminate**
5 **older members of the team and replace them with**
6 **younger people.**
7 Q. Now, do you know Brendan Gilmore's age?
8 **A. To the best of my memory -- do you mean at this**
9 **time?**
10 Q. Yes.
11 **A. To the best of my memory, Brendan Gilmore would**
12 **be between 55 and 58.**
13 Q. Now, Ms. Blozis, you said that you feel that
14 Brendan Gilmore wanted to eliminate older workers of
15 the team and replace them with younger ones?
16 **A. Yes.**
17 Q. And that was in response to the question why do
18 you think that Mr. Bell's forced resignation was as a
19 result of age? Why do you say that Gilmore wanted to
20 eliminate the older workers of the team and replace
21 them with younger ones?
22 **A. I don't understand the question.**
23 Q. What do you base that on when you make the
24 statement that Gilmore wanted to eliminate older

Page 37

1 workers of the team and replace them with younger
2 ones?
3 **A. I don't know why Brendan Gilmore wanted to**
4 **replace older members. I know that he replaced**
5 **Mr. Bell.**
6 **Correction: He put pressure on Mr. Bell**
7 **to resign. He put pressure on Linda Squier to resign.**
8 **He put pressure on Martha Feters to resign.**
9 Q. When you say that Gilmore put pressure on Bell
10 to resign, how do you know that?
11 **A. I know that from conversations with other**
12 **members of the team.**
13 Q. And who were those conversations with?
14 **A. Martha Feters, Linda Squier.**
15 Q. And what did Martha Feters tell you?
16 **A. At this time I cannot quote exactly.**
17 Q. You don't have to give me the exact.
18 Abbreviated or whatever you can recall.
19 **A. To the best of my recollection, Martha**
20 **indicated that Brendan Gilmore was overwhelming Robert**
21 **Bell with work that was unrealistic for any team**
22 **officer to do at that time.**
23 Q. And those were the gist of the conversations
24 that you were having with Martha Feters about

10 (Pages 34 to 37)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 38

1 Mr. Bell?
2 **A. Repeat that question, please.**
3 Q. You were giving me I guess an overall summary
4 of the conversations that you were having with Martha
5 Fetters concerning Mr. Bell and why Martha felt that
6 Gilmore was trying to force Mr. Bell to resign and she
7 was saying that Gilmore was giving Bell an
8 overwhelming amount of work to do that was
9 unrealistic.
10 **A. That was not the predominance of my**
11 **conversations with Martha Fetters regarding Bob Bell's**
12 **work.**
13 Q. What was the predominance?
14 **A. The predominance would include team work, team**
15 **responsibilities and would occasionally go towards the**
16 **fact of Mr. Bell's workload.**
17 Q. I think I understand what you're saying,
18 Ms. Blozis, is that you would have conversations with
19 Martha Fetters about work-related issues and from time
20 to time there would be conversations about Bell and
21 his workload but that wouldn't be what you and she
22 would be discussing in terms of it wouldn't be
23 Mr. Bell all the time; it would be work that you had
24 to complete?

Page 39

1 **A. Yes.**
2 Q. That was a convoluted question, but I think you
3 understood what I meant because you had said the
4 predominance wasn't Mr. Bell and it sounded like the
5 predominance of the conversations that you and Martha
6 were having had to do with other work-related issues,
7 not having to do with Mr. Bell.
8 **A. That's correct.**
9 Q. Okay. But focusing on the conversations that
10 you were having about Mr. Bell and the perception that
11 he was being given a lot of work to do in order to
12 force him out, that was conversation, you and Martha
13 were having those conversations from time to time. Is
14 that right?
15 **A. Yes.**
16 Q. Did you ever have any conversations with
17 Gilmore about Mr. Bell receiving unrealistic work
18 assignments?
19 **A. To the best of my memory, no.**
20 Q. Did you ever have any conversations with
21 Mr. Gilmore about Mr. Bell's performance, job
22 performance at any time?
23 **A. It wouldn't have been something Mr. Gilmore and**
24 **I would discuss.**

Page 40

1 Q. Do you know what job assignments Mr. Gilmore
2 was giving Mr. Bell?
3 **A. In the Mellon team structure of trust teams,**
4 **Mr. Bell would have been given specific duties as a**
5 **trust administrating officer.**
6 Q. Do you know specifically what Gilmore was
7 giving Mr. Bell to do?
8 **A. Mr. Bell was in the Philadelphia offices, so**
9 **specifically I would not know the exact job**
10 **responsibilities he was getting from Mr. Gilmore.**
11 Q. Do you know, did you ever have any discussions
12 with Mr. Gilmore about the level of work that was
13 being given to Mr. Bell?
14 **A. No.**
15 Q. Did you ever have any discussions with Mr. Bell
16 about the level of work that he was being given by
17 Mr. Gilmore?
18 **A. Specifically at this time I cannot recall exact**
19 **discussions with Mr. Bell.**
20 Q. Now, when you say that you can't recall at this
21 time, are you saying, Ms. Blozis, that you may have
22 had the discussions and you don't remember sitting
23 here today or that you didn't have the discussions?
24 **A. I'm not sure I understand what you mean by the**

Page 41

1 **word "discussion."**
2 Q. Conversation, talking.
3 **A. At this time I don't recall specific**
4 **conversations, other than when I may have seen**
5 **Mr. Bell in the Philadelphia offices at team meetings**
6 **and could read indications from him and see by the**
7 **work on his desk how much he was given versus other**
8 **officers.**
9 Q. So it was by when you went to his office or at
10 the meetings in Philadelphia, what, he seemed
11 stressed?
12 **A. Mr. Bell appeared to be stressed but had too**
13 **much panache to complain to coworkers.**
14 Q. And you said you would see on his desk more
15 work than you would see on others' desks.
16 Do you remember when you said when you
17 went to the Philadelphia office and you would see more
18 work on his desk than others' desks?
19 **A. Yes.**
20 Q. Who are you comparing his I guess the height of
21 the documents or the work?
22 **A. I would have seen trust files and work and**
23 **documents on Mr. Bell's desk.**
24 Q. And you were comparing the size of his, the

11 (Pages 38 to 41)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 42

1 files and documents on his desk as to others?
2 **A. As to others?**
3 **Q.** When you said you went to Philadelphia and you
4 saw on his desk trust files and other documents, it
5 seemed like you were saying that he had more of it on
6 his desk to do than other people?
7 **A. Yes.**
8 **Q.** My question was: Who are the other people that
9 seemed to have less on their desk than Mr. Bell?
10 **A. To the best of my recollection, the other trust**
11 **administrating officers at that time.**
12 **Q.** When was the period of time where you would go
13 and you would make that observation about the amount
14 of work on Mr. Bell's desk?
15 **A. As I remember, for the time period that**
16 **Mr. Bell was assigned to, was sitused in Philadelphia**
17 **as part of the team, of the Gilmore Delaware team.**
18 **Q.** Did you ever ask Mr. Bell why it was that he
19 had more files and documents on his desk than the
20 other trust officers?
21 **A. I don't recall asking Mr. Bell specifically**
22 **that question.**
23 **Q.** But words to that effect?
24 **A. Words to the effect?**

Page 43

1 **Q.** That you seem to have more -- when you say you
2 don't recall specifically asking him that question, it
3 may not have been the specific question of "I see you
4 have more trust files and documents on your desk than
5 the other trust officers."
6 It may have been "Oh, I see that you seem,
7 you know, you have more work than the others" or what
8 I was getting at when you said not specifically, it
9 may not have been that specific question but it may
10 have been in the ballpark of that question.
11 **A. In the ballpark of that question.**
12 **Q.** What would it have been?
13 **A. To the best of my memory, I may have made a**
14 **comment to Mr. Bell about his workload and what was**
15 **apparent to all team members to be his workload.**
16 **Q.** Did Mr. Bell ever say that he felt that he was
17 given more work because of his age?
18 **A. No.**
19 **Q.** And Mr. Gilmore was the person that was
20 responsible for giving all the trust officers work, to
21 your knowledge?
22 **A. To my knowledge, as team leader Brendan Gilmore**
23 **assigned the case loads to the individual trust**
24 **officers.**

Page 44

1 **Q.** Before we were talking about others that
2 Mr. Gilmore had put pressure on and Mr. Bell was one
3 and Ms. Squier was another?
4 **A. Is that your question?**
5 **Q.** Yes.
6 **A. Linda Squier was another.**
7 **Q.** And why do you say that Mr. Gilmore put
8 pressure on Linda Squier to resign?
9 **A. I was a witness to instances of those times**
10 **when Brendan Gilmore put pressure on Linda Squier.**
11 **Q.** And what did you witness?
12 **A. I witnessed Brendan Gilmore's unprofessional,**
13 **critical criticisms of how Linda Squier conducted her**
14 **work.**
15 **Q.** And do you remember when you witnessed this?
16 **A. Specifically not the dates.**
17 **Q.** Years?
18 **A. To the best of my memory, it would have been**
19 **the last year and a half that Linda Squier was**
20 **employed by Mellon.**
21 **Q.** I take it you don't remember when she left
22 Mellon?
23 **A. Not the exact date.**
24 **Q.** Was it sometime in 2000, in the 2000's?

Page 45

1 **A. To the best of my memory, it was before then,**
2 **the late 1990's.**
3 **Q.** Before we talk about Linda Squier, do you
4 remember -- I want to close the loop on Bell.
5 You had said that you also had
6 conversations with Linda Squier about Bell's workload?
7 **A. Yes.**
8 **Q.** When did you have conversations with her?
9 **A. I don't recall the exact dates.**
10 **Q.** What was the substance of the conversations?
11 **A. To the best of my recollection, on various**
12 **occasions Linda Squier would share information about**
13 **Robert Bell's workload.**
14 **Q.** And what would she say about the workload?
15 **A. To the best of my recollection, Linda strongly**
16 **intimated and stated that Mr. Bell was overloaded with**
17 **work.**
18 **Q.** Do you know if Mr. Bell -- let me back up.
19 Do you know if Mr. Gilmore ever had any
20 criticisms of Mr. Bell's work?
21 **A. To the best of my memory, I don't recall**
22 **specific dates, but I do recall Brendan Gilmore**
23 **criticizing Mr. Bell's history or work as a past**
24 **employee.**

12 (Pages 42 to 45)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 46

1 Q. And was that while Mr. Bell was employed that
2 you remember this?
3 A. I don't recall that it was when Mr. Bell was
4 still an employee of Mellon.
5 Q. You think it may have been after Mr. Bell left?
6 A. As I remember, it would be after he left.
7 Q. And do you remember what Mr. Gilmore was
8 saying?
9 A. At this time I don't exactly recall the words,
10 but I do recall Mr. Gilmore frequently criticizing
11 past or retired, resigned or fired employees of the
12 team.
13 Q. Do you remember specifically him mentioning
14 Mr. Bell?
15 A. At this time I don't specifically remember a
16 date that he mentioned Mr. Bell.
17 Q. Not a date. But do you remember him saying,
18 mentioning Mr. Bell specifically with respect to
19 criticism of the work?
20 A. To the best of my memory, there would have been
21 a team meeting where Brendan may have mentioned Robert
22 Bell, Linda Squier or Martha Feters and the way they
23 conducted the trust business.
24 Q. Can you be more specific when you said the way

Page 47

1 that they conducted the trust business what he said
2 about that?
3 A. Brendan Gilmore would conduct the team meetings
4 in a very brusque, arrogant manner in order to incite
5 the team to work harder and he would use those
6 instances to degrade past performances of employees
7 that were no longer part of the team.
8 Q. So he would mention the past employees by name?
9 A. Not always.
10 Q. Would it be along the lines of criticisms of
11 how past employees had done a particular job? I'm
12 just trying to get a sense of when you said that he
13 would use it as a mechanism to degrade past employees'
14 performances whether he would say this is how a report
15 was done by past employees and that was bad and this
16 is how we're going to do it now. I'm just trying to
17 get a sense of what you meant by that.
18 A. I'm not sure I understand fully the question.
19 Q. Well, when you say he would use the team
20 meetings at times to degrade past employees'
21 performances, can you tell me, give me some specifics
22 by way of examples of what he would do?
23 A. The team meetings weren't always conducted to
24 degrade past employees. Team meetings were held to,

Page 48

1 team meetings were held to review the current
2 situations of the files and to impart his feelings of
3 how the team should be working harder or better and
4 not to follow the examples of employees that were
5 released, let go or resigned.
6 Q. And so did you take from that that he
7 considered employees who were no longer there, let go,
8 forced to resign that he considered their work not to
9 be good work and that you should follow somebody
10 else's example of work?
11 A. I would have taken that in that manner.
12 Q. And do you remember him ever saying, you know,
13 don't do what Bell or Squier or Feters did, that was
14 bad work or words to that effect?
15 A. I don't recall him specifically saying don't do
16 Bell's, Squier's or Feters' work, that was bad work.
17 I recall Brendan Gilmore saying the
18 Delaware team was not going to be like it was under
19 Bell, Squier or Feters, to the best of my
20 recollection.
21 Q. Okay. And did he tell you how the Delaware
22 team was going to be?
23 A. Mr. Gilmore would conduct the meetings and tell
24 the team members how he wanted it to be.

Page 49

1 Q. What did he say in terms of how -- and I gather
2 how he wanted work to be done when you said how he
3 wanted things to be?
4 A. I'm not sure I fully understand your question.
5 Q. In the team meetings when you say that Mr. Bell
6 would tell everybody how he wanted things to be, would
7 he be talking about how he wanted the PORCH to be run,
8 how he wanted customers to be serviced, things of that
9 nature?
10 A. Yes.
11 Q. We were talking about Linda Squier and I
12 believe you said that you were a witness or you
13 witnessed Gilmore's unprofessional criticisms of her
14 work.
15 Did you ever overhear conversations that
16 Gilmore and Squier were having or did you see it?
17 When you said that you witnessed it, I'm trying to get
18 a sense of how it came about.
19 A. To the best of my recollection, I both heard
20 and saw.
21 Q. What did you see?
22 A. I recollect Brendan Gilmore brusquely
23 criticizing Linda's decisions or her conduct in
24 handling workloads, case files that she, trust files

13 (Pages 46 to 49)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 50

1 that she would have been responsible for in her
2 history with Mellon.
3 Q. And do you know if the criticism was accurate
4 criticism?
5 A. Not always.
6 Q. When you say, "Not always," meaning not always
7 accurate criticism?
8 A. Of Linda Squier's?
9 Q. That's what I mean.
10 When you say not always accurate
11 criticism, why do you say that?
12 A. Brendan Gilmore was a brusque, arrogant
13 manager. I recollect Linda Squier's rapport with the
14 trust clients to be professional. I felt when Brendan
15 Gilmore criticized her, it was completely unwarranted.
16 Q. Did Linda Squier discuss with you that she felt
17 that Brendan Gilmore's criticisms of her were
18 unwarranted?
19 A. Yes.
20 Q. Would that be what she would say, words to that
21 effect?
22 A. Yes.
23 Q. Did Linda Squier ever tell you that she felt
24 that she was being treated by Mr. Gilmore in that

Page 51

1 fashion, unprofessional criticism, brusque, because of
2 her age?
3 A. Specifically I don't recall that she used the
4 word "age."
5 Q. What did she use?
6 A. Used in?
7 Q. When she didn't use the specific "I think I'm
8 being treated this way because of my age," I gather
9 she never said that, did she say things that made you
10 believe that age was the reason?
11 A. To the best of my memory, Linda would talk
12 about, she would talk about the length of time that
13 she had served her trust clients in Mellon.
14 Q. In fact, in terms of she held the position for
15 a while and knew her job, so to speak?
16 A. Yes.
17 Q. You said that you had, I guess you had actually
18 seen Gilmore brusquely criticizing Linda and you said
19 you also had heard it?
20 A. Yes.
21 Q. The same thing, brusque criticism?
22 A. Yes.
23 Q. When you say you heard it, is your office next
24 to hers or is it in the hallway? How is it that you

Page 52

1 heard it?
2 A. At the time I reported to Linda Squier as a
3 trust officer she sat two desks away from me. I had
4 to hear whatever he said to her, whether at her desk
5 or behind a closed door because their voices would be
6 raised.
7 Correction: His voice would be raised.
8 Q. He would be speaking in a loud manner?
9 A. Brendan Gilmore would be speaking in a loud
10 manner? Yes.
11 Q. And so as a result you could hear what he was
12 saying to her?
13 A. Substantively, yes.
14 Q. And what you heard was criticism of the
15 performance?
16 A. Yes.
17 Q. I take it that you never performed a
18 performance review of Linda Squier?
19 A. That's correct.
20 Q. Did you ever hear Brendan Gilmore speak
21 brusquely to employees who were 40 and younger?
22 A. As I remember, the 40 and younger people that
23 were in the Philadelphia office, no.
24 Q. So those folks you wouldn't know about because

Page 53

1 you weren't in the Philadelphia office?
2 A. That's correct. Yes.
3 Q. Were there any individuals 40 and younger who
4 left Brendan's team at any point that you were there?
5 A. As I recall, I don't know the exact age of Ray
6 Masucci and Scott Gilliland, but they had left the
7 Gilmore team.
8 Q. Do you know why Masucci left?
9 A. No.
10 Q. And you had said Scott?
11 A. Gilliland.
12 Q. Gilliland. Do you know why he left?
13 A. No.
14 MR. LaROSA: Ms. Blozis, we have been
15 going for over 90 minutes. Would you like to take a
16 break?
17 THE WITNESS: I would like to take a rest
18 room break.
19 MR. LaROSA: Can we take a five-minute
20 break?
21 MS. WILSON: Sure.
22 (A brief recess was taken.)
23 MS. WILSON: Can you mark this as Blozis
24 2, please?

14 (Pages 50 to 53)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 114

1 **A. To the best of my recollection, I believe it**
2 **was Bill Becker on the bequest of Brendan Gilmore, the**
3 **team leader.**
4 Q. What are you basing that on?
5 **A. My recollection is that Kathleen was called**
6 **into Bill's office on a specific date in March, that**
7 **she was there for a while. I don't recall if it was**
8 **ten or fifteen minutes. That she exited the office,**
9 **went to her desk that was on the other side of my**
10 **cubicle, unbeknownst to me was packing up her things**
11 **and exited the building and Bill Becker came out and**
12 **told me that Kathleen was let go.**
13 Q. Did he tell you why Kathleen was let go?
14 **A. I don't specifically recall at that time**
15 **because I was so very upset and shocked by it.**
16 Q. By Kathleen being let go?
17 **A. Yes.**
18 Q. Do you know if Kathleen was having any
19 performance problems?
20 **A. I recollect that I surmised there must have**
21 **been.**
22 Q. How did you surmise that?
23 **A. During the last months of her employment I**
24 **could see that she was being overburdened with work**

Page 115

1 **and I would frequently ask her can I help you out in a**
2 **team spirit and she would not defer to my offer. And**
3 **I did not understand until after I was released that**
4 **she was instructed not to share that work as I was not**
5 **instructed to share my work with Maria Dunlop.**
6 Q. How do you know that she was instructed not to
7 share her work?
8 **A. After my release we may have had lunch and**
9 **talked about the situation.**
10 Q. In terms of a performance evaluation did you
11 ever conduct one of Kathleen?
12 **A. That wasn't the protocol at Mellon for**
13 **subordinates to review each other.**
14 Q. She was your coworker?
15 **A. Yes.**
16 Q. So as a coworker you would not have reviewed
17 her work?
18 **A. Absolutely not.**
19 Q. It would have been Becker and/or Gilmore?
20 **A. Yes.**
21 Q. And do you know how they assessed her work?
22 **A. That was not shared with me. That was not the**
23 **protocol to share each subordinate's reviews.**
24 Q. Did Kathleen say that she felt she was let go

Page 116

1 because of her age?
2 **A. Specifically she did not say the word -- no,**
3 **I'm not going to say that.**
4 **Specifically, she alluded to the fact of**
5 **her years in and her age and the fact that she was a**
6 **woman.**
7 Q. That's what she was telling you after she had
8 gone when you were meeting with her?
9 **A. Not in so many words but she alluded to that**
10 **fact, yes.**
11 Q. And that was after she was already gone?
12 **A. Yes.**
13 Q. Now, getting back to your conversation with
14 Rosemary Thomas, did you go into detail with her that
15 you felt that Gilmore's conduct and words were founded
16 in age because four other individuals over 40 had been
17 let go and you felt it was systematic? Did you get
18 into that kind of detail?
19 **A. I can't recall at this time specifically, but I**
20 **recollect that I told Rosemary that I found it very**
21 **odd that Mr. Bell was let go, that Linda Squier and**
22 **Martha Feters were forced out, that Kathleen was**
23 **dismissed, that I went from being the saving grace of**
24 **the team, the work force in Delaware, the support work**

Page 117

1 **force in Delaware to all of a sudden being on a hit**
2 **list, but I didn't use the word hit list. In this**
3 **context I'm saying that.**
4 Q. And what did Rosemary say?
5 **A. As I recall, she listened to me. I think she**
6 **answered in a political fashion, that Mellon's**
7 **striving to be better, that everybody needed to work**
8 **harder.**
9 Q. When you say, "a political fashion," what do
10 you mean by that?
11 **A. I don't feel that Rosemary Thomas was**
12 **exceptionally sympathetic to the specific complaint I**
13 **was making.**
14 Q. Why did you feel that way, that she wasn't
15 being sympathetic?
16 **A. She didn't cite specific Mellon procedures that**
17 **would be taken as far as do I sign a formal complaint?**
18 **Does she sit down with a superior and Brendan and**
19 **discuss the specific charge that I was making?**
20 Q. She didn't tell you what was going to happen as
21 a result of your conversation?
22 **A. Not specifically what would transpire after it,**
23 **no, I don't recollect, no.**
24 Q. Did she mention anything that would happen that

30 (Pages 114 to 117)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 118

1 would transpire?
2 **A. To the best of my memory, I think she said she**
3 **was going to speak to Brendan about it.**
4 **Q. Do you know if she spoke to Brendan?**
5 **A. I have no way of knowing that for sure.**
6 **Q. In terms of your answer, is it that Rosemary**
7 **never -- did Rosemary come back to you and say I've**
8 **spoken to Brendan and this is what has occurred or**
9 **what he says?**
10 **A. To my recollection, it would have to be that**
11 **when I returned from vacation I would have to assume**
12 **she spoke to Brendan because then I was handed a final**
13 **warning or given a final warning.**
14 **Q. And that's why you feel that she had spoken to**
15 **Brendan?**
16 **A. At this time I would have to say that's**
17 **probably why.**
18 **Q. And is it I guess the timing, is that what**
19 **you're basing it on, that you got the final warning**
20 **after you had complained about Brendan?**
21 **A. Yes.**
22 **Q. Do you know if there had been any discussions**
23 **about placing you on a final written warning prior to**
24 **your conversations with Rosemary about Brendan?**

Page 119

1 **A. Please repeat that.**
2 **Q. Sure.**
3 **MS. WILSON: Can you repeat that?**
4 **(The reporter read back the pending**
5 **question.)**
6 **THE WITNESS: I don't recall at this time.**
7 **BY MS. WILSON:**
8 **Q. When Brendan called you a survivor you took it**
9 **to mean a reference to you being the only one I**
10 **believe you had characterized it as left from the**
11 **team, the beginning team.**
12 **Was that in fact the case, that of all of**
13 **the initial team members that you were the only one**
14 **left?**
15 **A. Yes.**
16 **Q. Besides Brendan?**
17 **A. Before we went completely into a team concept**
18 **of people in Delaware working under people in**
19 **Philadelphia and people in Washington working under**
20 **people in Philadelphia, the original Delaware team**
21 **consisted of Robert Bell, Linda Squier, Kathleen Agne**
22 **and myself. Of those four, I was the only one**
23 **remaining.**
24 **Q. You and Brendan were the only ones remaining of**

Page 120

1 that team?
2 **A. Under his team. Under his team.**
3 **Q. Right.**
4 **A. Yes.**
5 **Q. Before the break, Ms. Blozis, we were talking**
6 **about Brendan Gilmore and one of the things that you**
7 **had said that you felt was indicative of age**
8 **discrimination was that he wanted to eliminate older**
9 **workers on his team and replace them with younger**
10 **people.**
11 **Do you remember that testimony?**
12 **A. Yes.**
13 **Q. Now, I believe we have gone through the older**
14 **workers that you were referring to and that would be**
15 **Kathleen Agne?**
16 **A. Yes.**
17 **Q. Robert Bell?**
18 **A. Yes.**
19 **Q. Martha Feters?**
20 **A. Yes.**
21 **Q. And Linda Squier?**
22 **A. Yes.**
23 **Q. And there's also another one. I'm looking on**
24 **pages 9 and 10 of your complaint, paragraph it's**

Page 121

1 starting with paragraph 53. It's 53a through e.
2 **A. Yes.**
3 **Q. If you look at e, Frances Smith.**
4 **A. Yes.**
5 **Q. Now, where was she with respect to the team --**
6 **A. She was not a member of the Gilmore team.**
7 **Q. Was she on another team?**
8 **A. She was on the Philadelphia team.**
9 **Q. Do you know, did each team have a name like**
10 **whoever the leader was, the Gilmore team? Was there**
11 **another team that she was on?**
12 **A. Yes.**
13 **Q. What was the name of her team?**
14 **A. I don't recall at the end of her career with**
15 **Mellon. At one time it was the Jane Lefend team, but**
16 **I don't believe that was the team, that Jane was the**
17 **team leader on Mrs. Smith's team when she was**
18 **released.**
19 **Q. And it says that she was forced to resign in**
20 **approximately September of 2003?**
21 **A. Yes.**
22 **Q. You don't remember whose team she was on at the**
23 **time?**
24 **A. At this time -- excuse me. Yes. I believe**

31 (Pages 118 to 121)

Blozis
Linda J. Blozis, Volume 1

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
July 26, 2006

Page 122

1 Bill Becker had taken over that team. That was the
2 team that he had taken over at the time, William
3 Becker.
4 Q. And how did you know Frances Smith?
5 A. We had the occasion to work in conjunction with
6 mutual clients. Over the course of my employment at
7 Mellon, various files were shifted from team to team
8 when the management decided the size of the clients'
9 portfolio would be moved from different teams. They
10 were restructuring the file management. And
11 frequently I would talk to Fran if she needed to be
12 brought up to speed about a particular client that
13 might have been managed on the Delaware team or the
14 Gilmore team that was then taken over by her team.
15 Q. Do you know what her title was in September of
16 '03?
17 A. To the best of my recollection, Fran had at one
18 time been promoted to a trust officer, but I recollect
19 that she was demoted to a comparable portfolio
20 administrator.
21 Q. And do you know why she was demoted?
22 A. Specifically I do not.
23 Q. Do you know who demoted her?
24 A. I do not know.

Page 123

1 Q. You say she was forced to resign. Why do you
2 say that?
3 A. In discussions with Fran it became apparent
4 that she was going through the same thing that I was
5 as far as job overload, criticism of her work
6 performance and I think ultimately received the or
7 else prerogative and Fran chose to resign her post,
8 her position.
9 Q. Did she tell you who it was that she was having
10 these issues with?
11 A. I recollect at this time that it was William
12 Becker.
13 Q. And did she tell you that she was being forced
14 to resign?
15 A. She didn't, to my memory she did not say it
16 specifically in those terms, she was being forced.
17 She intimated that she did not understand
18 exactly why the criticism of her had arisen and why it
19 seemed after years of dedicated hard work it wasn't
20 satisfactory anymore, any longer.
21 Q. So by her rendition of events you assumed it
22 was Bill Becker who was not happy with her work?
23 A. I can't say specifically it was Bill Becker or
24 management's or Mellon's ploy at this time.

Page 124

1 Q. Or Mellon's?
2 A. Mellon's ploy.
3 Q. Ploy, p-l-o-y?
4 A. P-l-o-y to eliminate employees over the age,
5 over the age of 40.
6 Q. When you say, "Mellon's ploy," what do you mean
7 by that?
8 A. If Mellon was adopting a policy to drive out,
9 force out, fire employees of a certain age or time in
10 and, in turn, hiring younger, unskilled, inexperienced
11 people to replace them.
12 Q. Do you ever see any written documentation that
13 Mellon had instituted such a thing?
14 A. No.
15 Q. Did anybody from Mellon ever tell you that
16 that's what was going on?
17 A. Who do you mean "from Mellon"?
18 Q. Other than the people, Martha and Frances or
19 Linda or Bell.
20 A. I don't think that would have been a policy to
21 show if there were, in fact, a document to show that
22 to portfolio administrators.
23 Q. Well, do you know if anything like that
24 existed?

Page 125

1 A. I have no knowledge of that.
2 Q. Did Frances Smith ever tell you that she was
3 forced to resign because of her age?
4 A. Not in those specific terms.
5 Q. It would have been along the lines of I have
6 been here for X number of years, I've done a good job,
7 I don't understand why now things aren't going well
8 for me or something along those lines?
9 A. Yes.
10 Q. Did you ever have any conversations with Bill
11 Becker about Frances Smith?
12 A. No.
13 Q. And I take it you never performed any
14 performance evaluations of Frances Smith?
15 A. As I stated before, it was not a policy of
16 Mellon for trust portfolio assistants to offer reviews
17 on subordinates or certainly not people who were at
18 levels above my position.
19 Q. Do you know whether any of the younger members
20 of the Gilmore team got any negative evaluations?
21 A. I have no way of knowing that. I don't believe
22 they have.
23 Q. What is your belief based on?
24 A. My belief is based on the fact that Brendan

32 (Pages 122 to 125)

EXHIBIT B

Blozis
Brendan Michael Gilmore

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
December 19, 2006

Page 18

1 A. Not a history on the annual evaluations, no.
2 This would not be included in an annual evaluation.
3 Q. Right. Is this a summary of --
4 A. This is a summary of cumulative valuations, but
5 the employee evaluation would be for a specific period of
6 time only.
7 Q. And as far as other information on this document,
8 calling your attention to the top right-hand page, does
9 Mellon record the employee's birth date on the document?
10 A. I don't see a birth date.
11 Oh, yes, I do. Yes, there is a birth date,
12 yes.
13 Q. And does Mellon also record an employee's age on
14 the employee profile?
15 A. On this thing?
16 Q. Yes.
17 A. Yes, it does.
18 Q. Okay. And does Mellon also record an employee's
19 marital status on this employee profile?
20 A. It is on this, this form, yes.
21 Q. And does Mellon also record an employee's race on
22 the employee profile?
23 A. This one reflects race, yes.
24 Q. Does Mellon record an employee's gender on an

Page 19

1 employee profile?
2 A. This profile also records gender.
3 Q. To the best of your knowledge, Linda Blozis was
4 never demoted during the time she worked at Mellon; is
5 that accurate?
6 A. I don't know.
7 Q. If she were to be demoted, would you have any
8 input into that decision?
9 A. If I was her manager at that time, yes, obviously
10 I would be involved.
11 Q. During the time that you oversaw the Delaware
12 office, Linda Blozis was not demoted; is that accurate?
13 A. That is correct.
14 Q. And during the time that you oversaw the Delaware
15 office and she worked out of the Delaware office, Linda
16 Blozis was not suspended; is that correct?
17 A. No, she was not.
18 Q. You said at some point the portfolio
19 administrator job was upgraded. Who was responsible for
20 upgrading the portfolio administrator job?
21 A. That was a company-wide decision, all portfolio
22 administrators nationally be upgraded at the same time.
23 It was done, I would say, I guess by human resources.
24 It was done by senior management, let me say

Page 20

1 that.
2 Q. Was there a portfolio administrator in the
3 Delaware office named Kathleen Agne?
4 A. Yes.
5 Q. Was she eventually discharged?
6 A. Yes.
7 Q. And who discharged her?
8 A. You mean who actually did it, or who had the
9 meeting with her, or how was the decision arrived?
10 Q. Who made the decision?
11 A. The decision was made ultimately by senior
12 management.
13 Q. Who was that?
14 A. Ultimately be my superior.
15 Q. Who was that?
16 A. And human resources together would have made
17 that, come to that conclusion. At that time?
18 Q. Yes.
19 A. I believe his name was Doug Kloppenburg.
20 Q. What was his title?
21 A. He was the Manager for Private Asset Management
22 in the Mid-Atlantic Region.
23 Q. Who was the HR person or persons?
24 A. HR rep in that area is Rosemary Thomas. But she

Page 21

1 would not -- it would have gone to her superiors, as it
2 would have gone to mine.
3 Q. Who was her superiors at that time?
4 A. You would have to ask her.
5 Q. Kathleen Agne, her position was not eliminated;
6 is that correct?
7 A. That's correct.
8 Q. Eventually another portfolio administrator was
9 hired to replace her?
10 A. Yes.
11 Q. Was that Maria Bannister or Maria Dunlop?
12 A. I believe it was.
13 Q. Who made the decisions with regard to hiring
14 employees for your Delaware office?
15 A. Well, the people who worked with -- who they
16 would be working with would participate in the interview
17 process. I more likely as not would also interview them.
18 And then based on all of our opinions that they felt they
19 had the skill set, we would then make the recommendation
20 to hire, which would have to be approved by my superior.
21 And -- well, he could or could not ask to interview the
22 person. He had that latitude.
23 Q. Was that Doug Kloppenburg?
24 A. At that time, yes.

6 (Pages 18 to 21)

Blozis
Brendan Michael Gilmore

v.
 C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
 December 19, 2006

Page 22

1 Q. And did he wind up interviewing Maria Bannister
 2 or Maria Dunlop?
 3 A. I don't believe so.
 4 Q. Did you interview Maria Bannister or Maria
 5 Dunlop?
 6 A. Yes.
 7 Q. At some point a decision was made that included
 8 you to hire Maria?
 9 A. Yes.
 10 Q. And that decision was approved by senior
 11 management?
 12 A. Yes.
 13 Q. Was that in approximately 2002?
 14 A. I believe so. I don't know.
 15 Q. Was there an individual named Frances Smith who
 16 worked for you at Mellon?
 17 A. No, not to my knowledge.
 18 Q. Was there anybody named Smith that worked for you
 19 out of the Delaware, Philadelphia or Washington, D.C.
 20 office?
 21 A. I don't remember anyone named Smith working for
 22 me. I had a number of employees. I mean, I, I don't
 23 remember anybody by that name.
 24 Q. Do you remember anybody by the name of Martha

Page 23

1 Feters?
 2 A. Yes.
 3 Q. What was her title?
 4 A. She was a vice president.
 5 Q. What was her function?
 6 A. She was, when I came to Philadelphia and took
 7 responsibility for Delaware, she was responsible for the
 8 Delaware office. She was in charge of the Delaware
 9 office.
 10 Q. At some point did she resign from Mellon?
 11 A. Shortly after I came to the region she resigned,
 12 within I think six months.
 13 Q. Did you replace her with someone else to fill the
 14 position?
 15 A. Yes, yes.
 16 Q. Who was that?
 17 A. Bill Becker.
 18 Q. Do you remember when that was?
 19 A. 1998, thereabouts.
 20 Q. Did Martha Feters hold any other title other
 21 than vice president and being the person responsible for
 22 the Delaware office during the time she worked for you?
 23 A. Not -- no.
 24 Q. Did she ever take a step down to a lower

Page 24

1 position?
 2 A. Not to my knowledge.
 3 Q. Are you familiar with a person named Linda
 4 Squirer?
 5 A. Yes.
 6 Q. What was her job title?
 7 A. I think she was an assistant vice president.
 8 Q. Where did she work?
 9 A. In the Delaware office.
 10 Q. Did she eventually resign her position?
 11 A. Yes, she did.
 12 Q. Do you remember when she was?
 13 A. I would be speculating, but I believe it would
 14 have been about a year and a half later, after -- well,
 15 let me rephrase that. Perhaps late '99.
 16 Q. Had she previously reported to Martha Feters?
 17 A. Yes.
 18 Q. At the time her employment ended did she report
 19 to Bill Becker?
 20 A. Yes.
 21 Q. Are you familiar with a Robert Bell?
 22 A. Yes.
 23 Q. What was his title?
 24 A. I believe he was assistant vice president also.

Page 25

1 Q. Did he work out of the Delaware office?
 2 A. He actually split his time between Philadelphia
 3 and Delaware. I believe officially he was located -- he
 4 was attached to the Philadelphia office.
 5 Q. Prior to splitting his time between Delaware and
 6 Philadelphia had he just worked solely out of
 7 Philadelphia?
 8 A. I don't know.
 9 Q. Functionally, was he a portfolio officer?
 10 A. Functionally, yes, although that probably wasn't
 11 the title we were using at that time.
 12 Q. There might have been another title?
 13 A. He might have been a portfolio administrator.
 14 These jobs, they have reclassified all of these different
 15 jobs. But, yes, he would be called a portfolio officer
 16 today. He dealt with clients. He was the professional
 17 who dealt with clients.
 18 Q. During the time that Linda Blozis was working on
 19 your team out of the Delaware office, my understanding is
 20 she was a portfolio administrator, there were portfolio
 21 administrators, and then above the portfolio
 22 administrators there was portfolio officers?
 23 A. Yes.
 24 Q. Are you telling us that today the portfolio

7 (Pages 22 to 25)

EXHIBIT C

Blozis
William S. Becker

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
January 5, 2007

Page 10

1 **A. Yes.**
2 Q. Approximately how many employees did you
3 supervise in your role of portfolio manager?
4 **A. Two.**
5 Q. Who were they?
6 **A. Linda Blozis and Katie Agne.**
7 Q. Is that the Kathleen Agne --
8 **A. Kathleen Agne, correct.**
9 Q. What was Kathleen Agne's title?
10 **A. I don't remember what her title was.**
11 Q. Do you remember what Linda Blozis' title was?
12 **A. She was an assistant, I believe portfolio**
13 **assistant.**
14 Q. You told us earlier that you supervised or
15 managed Linda Blozis between September of 1998 and
16 December of 2002 or the end of I think you said the
17 end of 2002?
18 **A. Yes.**
19 Q. During that same time did you supervise
20 Kathleen Agne?
21 **A. Yes.**
22 Q. Did Kathleen Agne leave Mellon at some point in
23 that time frame?
24 **A. Yes, she did.**

Page 11

1 Q. Do you remember when that was?
2 **A. I do not recall when that was.**
3 Q. Did Kathleen Agne resign her employment?
4 **A. Kathleen Agne was -- her employment was**
5 **terminated.**
6 Q. And who made the decision to terminate her
7 employment?
8 **A. That was a joint decision between or among Greg**
9 **Landis, Brendan Gilmore and me.**
10 Q. Approximately how old was Kathleen Agne at the
11 time her employment ended?
12 **A. I don't know.**
13 Q. Was she over the age of 40?
14 **A. I believe so.**
15 Q. Do you recall what the stated reason was she
16 was told her employment was being terminated?
17 **A. As I remember she had many errors and she**
18 **wasn't completing her work that was assigned in a**
19 **timely manner.**
20 Q. Do you remember approximately what year her
21 employment was terminated?
22 **A. Either 2000 or 2001.**
23 Q. Did Mellon eventually hire someone to replace
24 Kathleen Agne?

Page 12

1 **A. Yes.**
2 Q. Who replaced Kathleen Agne?
3 **A. Maria Bannister.**
4 Q. Is that the person that eventually became Maria
5 Dunlop?
6 **A. Yes, I'm sorry, yes.**
7 Q. When she was hired first she was Maria
8 Bannister?
9 **A. Yes.**
10 Q. Prior to you supervising Linda Blozis who was
11 her direct supervisor?
12 **A. I believe Martha -- it was a woman that was no**
13 **longer at Mellon when I was hired. I'm trying to**
14 **remember her name.**
15 Q. Was that Martha Feters?
16 **A. Martha Feters I think it was.**
17 Q. Did Martha Feters retire or resign from
18 Mellon?
19 **A. I don't know.**
20 Q. You just know that at some point her employment
21 ended?
22 **A. Yes.**
23 Q. Do you remember approximately what year that
24 was?

Page 13

1 **A. I was hired in 1998 and she wasn't there.**
2 **That's really all I know. It was prior to me**
3 **starting, so --**
4 Q. Sometime prior to September of --
5 **A. Sometime prior to September of 1998, correct.**
6 Q. When you became a supervisor for Ms. Agne and
7 Linda Blozis, did you have a chance to review their
8 personnel files before you began working with them?
9 **A. Not before I was working with them. At some**
10 **point while they were -- while they were employed I'm**
11 **certain I looked at their files that were kept in the**
12 **office or kept at the team leader office.**
13 Q. And under her prior supervisor, Martha Feters,
14 Linda Blozis did not have any final warnings in her
15 file, is that correct?
16 MS. WILSON: Objection to form. You can
17 answer.
18 **A. I don't remember seeing any.**
19 Q. To the best of your recollection she didn't
20 have any disciplinary actions in her personnel file?
21 **A. As I remember I don't remember anything like**
22 **that in there.**
23 Q. What was your working relationship with Greg
24 Landis when you came to the -- is it called the

4 (Pages 10 to 13)

Blozis
William S. Becker

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
January 5, 2007

Page 46

1 Mellon?
2 **A. I was contacted by I forget whom at Mellon**
3 **asking if I was interested in coming back.**
4 **Q. Is that Brendan Gilmore?**
5 **A. I believe the first contact was from Ron Clark**
6 **and then subsequent to that Brendan did call. Then,**
7 **Rosemary Thomas called and then that's enough detail**
8 **maybe.**
9 **Q. What was Ron Clark's position at the time?**
10 **A. He was -- he is the managing director for**
11 **sales.**
12 **Q. And at some point were you hired back by**
13 **Mellon?**
14 **A. Yes, I began working for Mellon again June 6,**
15 **2006.**
16 **Q. When you started back on 6-6-06 where were you**
17 **assigned to work?**
18 **A. The Philadelphia office.**
19 **Q. And were you assigned to Brendan Gilmore's team**
20 **again?**
21 **A. No. I have my own team. I'm a team leader. I**
22 **guess that's another title.**
23 **Q. Are you in a role that was previously filled by**
24 **Brendan Gilmore?**

Page 47

1 **A. There are five team leaders in the Philadelphia**
2 **office. So, my current role is the same as Brendan**
3 **Gilmore's role currently, but also back in 1998 when I**
4 **started. So, it's an equivalent role to what Brendan**
5 **has.**
6 **Q. You are filling an equivalent role as one of**
7 **the five team leaders?**
8 **A. Yes.**
9 **Q. Do you have responsibility for any other**
10 **offices other than Philadelphia?**
11 **A. No, just the Becker team in Philadelphia.**
12 **Q. Who has responsibility for the Delaware office**
13 **today?**
14 **A. Greg Landis.**
15 **Q. Is he a team leader?**
16 **A. I believe he is, yes.**
17 **Q. Is he stationed in Philadelphia?**
18 **A. Greg is stationed in Greenville, Delaware.**
19 **Q. During the time that Linda Blozis was in the**
20 **Delaware office working and reporting to you there**
21 **were no younger assistants than her, is that correct?**
22 **A. No. Maria Bannister appeared younger than me.**
23 **So, I assume that she was younger than Linda.**
24 **Q. Did you know a Frances Smith at Mellon?**

Page 48

1 **A. Yes.**
2 **Q. What was her title?**
3 **A. I don't remember what her title was. I believe**
4 **she had an assistant title. Whatever that was, there**
5 **were several different variations, but it would be**
6 **considered similar to what Linda's title was.**
7 **Q. Prior to being an assistant did she have**
8 **another position?**
9 **A. Did Fran Smith?**
10 **Q. Frances Smith, yes.**
11 **A. I don't know.**
12 **Q. Was Frances Smith ever demoted?**
13 **A. I don't know whether or not she was demoted.**
14 **Q. Did Frances Smith eventually resign from**
15 **Mellon?**
16 **A. I believe she did, yes.**
17 **Q. Do you know why she resigned from Mellon, if**
18 **you know?**
19 **A. Do I know -- I'm sorry?**
20 **Q. Why she resigned from Mellon, if you know?**
21 **A. I don't know why she resigned.**
22 **Q. Had Martha Feters reported to Brendan Gilmore?**
23 **A. I believe so. I'm assuming that since she had**
24 **-- when I took over the -- her role I reported to**

Page 49

1 **Brendan, so I assume that she did.**
2 **Q. You were hired by Brendan Gilmore --**
3 **A. Yes.**
4 **Q. -- the first time you were working at Mellon?**
5 **A. Yes, I was.**
6 **Q. He hired you to replace Martha Feters, is that**
7 **correct?**
8 **A. I believe so.**
9 **Q. And Linda Squier eventually resigned from**
10 **Mellon, is that correct?**
11 **A. That's correct.**
12 **Q. Did she submit a resignation to Brendan**
13 **Gilmore?**
14 **A. I don't remember. I believe she would have**
15 **either submitted that to Brendan or to me, but to**
16 **someone. I don't know.**
17 **Q. You don't recall receiving a resignation from**
18 **her?**
19 **A. I don't remember that, no.**
20 **Q. So, she may have submitted a resignation to**
21 **Brendan Gilmore?**
22 **A. She may have, yes.**
23 **Q. Did you know a Robert Bell at Mellon?**
24 **A. Yes.**

13 (Pages 46 to 49)

Blozis
William S. Becker

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
January 5, 2007

Page 50

1 Q. What was Mr. Bell's title?
 2 A. I believe Bob was -- he was a fiduciary
 3 officer. I don't know whether he was an assistant,
 4 but an officer, I believe he was an officer. He had
 5 been there a long time.
 6 Q. Did he report to Brendan Gilmore?
 7 A. I do not know that specifically. I assume he
 8 did because he was on that team.
 9 Q. He had been at Mellon a long time, you said?
 10 A. I believe so.
 11 Q. Was he over the age of 40?
 12 A. I believe so.
 13 Q. And did he eventually resign?
 14 A. I don't know if he resigned or retired. I know
 15 he had health problems. I never worked with Bob.
 16 Q. Was Brendan Gilmore concerned about Robert
 17 Bell's health problems?
 18 MS. WILSON: Objection to form.
 19 A. I don't know.
 20 Q. Was anyone at Mellon concerned about Robert
 21 Bell's health problems?
 22 MS. WILSON: Same objection.
 23 A. I don't know.
 24 Q. You weren't concerned about Robert Bell's

Page 51

1 health problems?
 2 MS. WILSON: Objection to form.
 3 A. I don't know that I ever met Bob Bell before he
 4 retired.
 5 Q. There were no assistants on Gilmore's team, no
 6 assistants or portfolio administrators on Gilmore's
 7 team, that were older than Linda Blozis, correct?
 8 MS. WILSON: Objection to form. You can
 9 answer.
 10 A. I don't know.
 11 Q. You told us that Brendan Gilmore hired you,
 12 correct?
 13 A. That's correct.
 14 Q. And Brendan Gilmore also hired Maria Dunlop, is
 15 that correct, or Maria Bannister?
 16 A. I believe Brendan would have approved the hire.
 17 Greg Landis did the interview for that position. If
 18 Brendan approved it, I'm certain it was at Greg's
 19 recommendation.
 20 Q. To the extent of your knowledge Greg Landis did
 21 not have the hiring authority at that point and he
 22 would do the interview?
 23 MS. WILSON: Objection to form. You can
 24 answer.

Page 52

1 A. Team leaders have the authority to hire. They
 2 need to approve requisition for the new hire. I'm
 3 sorry, I forgot the question.
 4 Q. At that point Greg Landis wasn't a team leader?
 5 A. That's correct.
 6 Q. So, he wouldn't have had the authority to
 7 approve the hiring of Maria Dunlop or Maria Bannister,
 8 correct?
 9 A. No, the team leader is the only person that can
 10 approve a hire for the team.
 11 Q. Brendan Gilmore would have had to hire Maria
 12 Bannister or Maria Dunlop?
 13 A. At Greg's recommendation or mine if it was
 14 appropriate.
 15 Q. Did Brendan Gilmore hire a Dan Merlino?
 16 A. I'm sorry, what is the name?
 17 Q. Dan Merlino, M-E-R-L-I-N-O?
 18 A. Yes, yes, I believe he did.
 19 Q. What was Dan Merlino's position?
 20 A. I believe he was an assistant.
 21 Q. Was he in his 30's?
 22 A. I don't know.
 23 Q. Was he under the age of 40?
 24 A. I believe he was.

Page 53

1 Q. And did Brendan Gilmore hire a Kristy Hunt,
 2 K-R-I-S-T-Y, Hunt, H-U-N-T?
 3 A. I don't know whether Brendan hired Kristy or
 4 not.
 5 Q. What was Kristy Hunt's position, if you know?
 6 A. I believe she was a portfolio officer on the
 7 investment side.
 8 Q. Did she work out of the Philadelphia office?
 9 A. Yes, she did.
 10 Q. Did she work on Brendan Gilmore's team?
 11 A. I believe she did at one point, yes.
 12 Q. Did Brendan Gilmore hire a Tom Galante?
 13 A. Tom Galante?
 14 Q. Yes, G-A-L-A-N-T-E?
 15 A. I don't recognize that name as someone that
 16 worked for Brendan.
 17 Q. Do you know any Tom G, Tom with the last
 18 initial G?
 19 A. There is -- well, I believe Tom Galante works
 20 in our HR department. I might have the first name
 21 wrong. There is a Tom G currently at Mellon whose
 22 name is Tom Grugan. He works for a different team
 23 than Brendan and he was just recently hired.
 24 Q. As far as Linda Blozis' employment with Mellon

14 (Pages 50 to 53)

EXHIBIT D

Blozis
Rosemary Curtis Thomas

v.
C.A. # 05-891 (SLR)

Mellon Trust of Delaware, et al.
December 19, 2006

Page 46

1 portfolio administrator; is that correct?
2 **A. I know that Maria replaced Kathy. I'm not quite**
3 **sure of the date. But she was her replacement.**
4 Q. As far as a Frances Smith, are you aware of an
5 employee named Frances Smith?
6 **A. Yes.**
7 Q. And what was her title?
8 **A. Portfolio Administrator.**
9 Q. Did she have any other titles at Mellon, during
10 her time at Mellon?
11 **A. I believe she was an assistant portfolio officer**
12 **at one point, and her title was adjusted to Portfolio**
13 **Administrator.**
14 Q. As an assistant portfolio officer, is that more
15 or less responsibility than a portfolio administrator?
16 **A. It is more.**
17 Q. So at some point she was given reduced
18 responsibilities and her title changed from Assistant
19 Portfolio Officer to Portfolio Administrator?
20 **A. Yes.**
21 MS. WILSON: Objection to form. You can
22 answer.
23 **A. Yes.**
24 Q. Who did that?

Page 47

1 **A. I'm trying to remember who her manager was. She**
2 **was not on the same team that Linda Blozis was on. I'm**
3 **sorry, I really don't remember.**
4 Q. She was on a team in the Delaware office?
5 **A. No.**
6 Q. Was she in the Philadelphia office?
7 **A. Yes.**
8 Q. I think you told us earlier that Brendan Gilmore
9 was responsible for both the Philadelphia office and the
10 Delaware office?
11 **A. Yes. But I don't believe that she was on the**
12 **Gilmore team in the Philadelphia office. I think she was**
13 **on a totally different team.**
14 Q. Okay. Well, you believe she was in Philadelphia.
15 Did Gilmore have some kind of management responsibility
16 for other teams in the Philadelphia office?
17 **A. No.**
18 Q. Just so I understand, did you tell us that
19 Brendan Gilmore managed the Delaware office, as well as
20 the Philadelphia office or part of the Philadelphia
21 office?
22 **A. He managed the Delaware Private Wealth Management**
23 **investment management team, and he managed an investment**
24 **management team in Philadelphia, which was unusual. Most**

Page 48

1 **managers just have one location. He had two.**
2 **Now, there are other teams in Philadelphia**
3 **besides what we were refer to it as the Gilmore team,**
4 **because he was the manager. There are other managers of**
5 **other teams in the Philadelphia office. That's the**
6 **largest office. So there is more than one investment**
7 **management team there.**
8 **And I don't believe that Frances Smith had**
9 **anything to do with Brendan Gilmore on his team.**
10 Q. Other than they both worked in the Philadelphia
11 office?
12 **A. Other than they both worked in the Philadelphia**
13 **office, that's it.**
14 Q. And was there a Martha Feters who worked for
15 Mellon?
16 **A. Yes.**
17 Q. What was her title?
18 **A. I don't remember.**
19 Q. Did she work for Brendan Gilmore?
20 **A. Yes, she did.**
21 Q. And did she eventually resign?
22 **A. I don't remember. I believe she did.**
23 Q. As far as a time frame, was that in approximately
24 2003?

Page 49

1 **A. I really don't remember.**
2 Q. Was there a Linda Squirer who worked at Mellon?
3 **A. Yes.**
4 Q. And did she work for Brendan Gilmore?
5 **A. Yes.**
6 Q. What was her title?
7 **A. I don't remember.**
8 Q. Did she eventually resign?
9 **A. Yes.**
10 Q. Was that recently or was that a few years ago?
11 **A. That would have been a few years ago.**
12 Q. Do you think that was in approximately 2003?
13 **A. I'm sorry, I really don't remember the year.**
14 Q. Was there a Robert Bell who worked at Mellon?
15 **A. Yes.**
16 Q. Was he a senior trust officer?
17 **A. Yes, I believe he was.**
18 Q. Did he work for Brendan Gilmore?
19 **A. Yes, he did.**
20 Q. And did he eventually resign?
21 **A. As I recall, he retired.**
22 Q. Was that a joint decision by him and Mr. Gilmore?
23 **A. As I recall, he retired, and retirement would be**
24 **solely his decision. We don't have mandatory retirement.**

13 (Pages 46 to 49)